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NAEB file

Hull

Memorandum:

On February 14, 1946, Commissioner C. J. Durr of the Federal Communications Commission, H. B. McCarty of Station WHA and the National Association of Educational Broadcasters, Belmont Farley of the National Education Association, Franklin Dunham of the U. S. Office of Education, Walter Emery of the Federal Communications Commission, and Edward M. Brecher of the Metropolitan Broadcasting Corporation met informally, as individuals, in Washington, to discuss the need for certain additional services to educational FM broadcast stations, and possible ways and means for establishing such services. The attached two memoranda have been drafted* in an effort to reduce to writing the concensus of the views expressed at at the February 14 discussion.

(*Drafted by Ed Brecher, to whom NAEB owes a thousand thanks. HBMcC)

I. NEED FOR ADDITIONAL SERVICES TO EDUCATIONAL FM BROADCAST STATIONS

In 1938, shortly before the Federal Communications Commission recognized the significance of FM broadcasting, it assigned a small band in the radio spectrum, not particularly desired by other services, to noncommercial educational broadcasting. Subsequently, FM broadcasting was placed immediately adjacent to this educational band, and the educational band was made available for educational FM broadcasting. The result was much as if educators, given a sandy stretch of desert land, discovered that they were on the edge of an invaluable oil basin, and that the oil extended also under their land.

Educational interest in FM broadcasting grew so rapidly that by 1944, when the F.C.C. considered reallocation of radio channels to various services, it was evident that the five FM channels reserved for education would be inadequate in many regions to establish statewide educational broadcast systems. The U. S. Office of Education proposed, accordingly, that the number of educational channels be increased from five to fifteen. But no organization existed anywhere in the educational or radio fields strong enough to implement this proposal with a comprehensive and detailed presentation before the F.C.C.

Fortunately, Belmont Farley of the National Education Association stepped into the breach. Working closely with the F.C.C. and U. S. Office of Education staffs, Mr. Farley held several prehearing conferences at which the needs of education were itemized,

the support of educational institutions and associations was mobilized, resolutions were drafted, testimony planned, witnesses lined up, and questionnaires circulated. As a result, by the time of the F.C.C. hearings on FM, American education was ready with a series of nearly thirty witnesses, scores of exhibits, and an abundance of concrete evidence pointing to the need for more educational FM channels.

The approach improvised in these FM hearings was amazingly successful. The F.C.C., after listening en banc for an entire day and part of a second day to the educational presentation, allotted 20 FM channels to education instead of the 15 which had been requested. Education at last had its own "home on the air."

The allocation of channels by the F.C.C., however, is only the first of many steps necessary for establishing an American system of educational broadcasting. This memorandum is designed to outline briefly the additional steps which must now be taken, and Memorandum II will outline possible ways and means for facilitating such steps.

1. Holding the 20 channels. What the F.C.C. has given, the F.C.C. can, and quite possibly may, take away. The 20 FM channels reserved for noncommercial educational broadcasting are not reserved forever, for a century, for a decade, or even necessarily for another year. The nature of FM development is such that a demand for cutting down the number of educational channels may be expected in the near future.

In New York, Boston, Baltimore, Philadelphia, Washington Detroit, Chicago, Indianapolis, and many other cities the number of channels allocated for metropolitan commercial FM broadcast is already inadequate. In New York, for example, there are roughly 26

applications for 9 or 10 remaining FM channels. In Boston, there are 12 or more applications for 11 or less channels. In other cities, similar ratios between applications and available commercial channels prevail. Following hearings, the F.C.C. will shortly be turning down applicants for commercial FM facilities on the ground that no channels are available in the area.

As soon as this occurs, the disappointed applicants will almost certainly look over the spectrum to find a solution--and the most conspicuous feature they will see will be 20 vacant or almost vacant FM channels immediately adjacent to the commercial FM band. Why, they will ask, should these channels lie idle, serving no one, when we are prepared to use them in the public interest? Just as during the 1920s and early 1930s, one educational standard broadcast channel after another was reassigned to commercial interests, so we may anticipate at the least a gradual erosion of the present educational FM reservation.

Indeed, the process may be cataclysmic rather than gradual. The original F.C.C. spectrum allocation established 10 FM channels throughout the country for facsimile broadcasting. Within a few months, the pressure for more commercial FM channels had increased so much that the 10 channels were taken away from facsimile in the Eastern area where they were needed most. A similar transfer of a whole group of channels from educational FM is at least possible.

In the long run, and through the years, the only way to prevent such a result will be for educators actually to use to capacity the channels assigned them. But education moves slowly. Some years may elapse before a saturation point is reached. During this period, a strong educational organization will be necessary to pursue on a continuous basis the enthusiastic beginnings which

were so effectively organized for the 1944 hearings.

Of the seven Commissioners who unanimously reserved 20 channels for education following the 1944 hearings, only three or four remain. The F.C.C. staff similarly undergoes continuous change. To meet this situation, all interests in radio except the educators--commercial broadcasters, communications interests, etc.-- have permanent Washington representation before the F.C.C. Indeed, even special types of stations like the clear-channel stations, the regional stations, etc., maintain their own representation. To preserve their 20 channels through the months and years to come, educational FM broadcasters need similar representation.

2. Rules and Regulations. In March 1946, the F.C.C. announced its first tentative Rules and Regulations governing non-commercial educational FM broadcasting. These rules and regulations constitute the terms and conditions under which educational stations must operate. They will be revised requently through the months or years ahead. An organization of educational broadcasters is urgently needed to keep these rules and regulations in line with educational needs.

Several dangerous proposals have already been made in this respect. One is the proposal to limit educational stations to "educational" programs designed for classroom use, and to prohibit programs addressed to the general public or "entertainment" programs. A second is the proposal to license educational stations to non-educational institutions, merely on the promise that their programs will be "educational."

Other proposals made or in the offing require thoughtful consideration and decision on the part of those interested in

educational braodcasting. For example, there is the possibility that "educational" stations may be offered substantial subsidies by commercial stations in the same city. Would such subsidies result in commercial control of educational stations? What terms and conditions should be insisted upon before the F.C.C. approves such a subsidy arrangement? These and scores of other problems lie immediately ahead; education must have a voice in the decisions.

Again, the rules and regulations may in a variety of ways hamper individual educational FM broadcast stations. Thus only recently Columbia University was granted its FM licenses, but with a power much lower than it had requested. The result was to reduce markedly the area which Columbia will be able to reach with its broadcasts. The justification of the decision is that the more power Columbia is permitted, the fewer educational stations can be accommodated on its channel. But the essential evil is that the decision was made, and may become a precedent, without any consideration on the part of educational broadcasters themselves, and without any representation of their interest in the matter. Such decisions are handed down from month to month, almost from week to week. Continuous representation of educational broadcasting interests is necessary in order to keep educators informed of the issues, and to speak in their behalf where educational interests are threatened.

In addition to rules and regulations, the F.C.C. takes a variety of other types of action which may impair educational broadcasting. For example, in 1940 the F.C.C. negotiated a "North American Regional Broadcasting Agreement" which on its face had no relation to education whatever. One obscure clause in the agreement, however, redefined "daytime hours" to begin at sunrise instead of at 6 a.m. The result was to deprive a number of educational stations

of their invaluable early morning time. Not until long after the agreement was negotiated did educators even know what had happened to them. More recently, in 1946, a second North American Agreement has been negotiated which may destroy the hopes of several educational broadcast stations for full-time operation. Commercial broadcasters whose status is affected by the agreement are organized to the hilt to secure modifications of this Second Agreement, and will no doubt succeed, while the educational institutions concerned are apparently not even informed of the threat.

Many reasons have been assigned for the gradual reduction in number of educational broadcast stations from more than 100 to fewer than 30 during the early 1930s. Reading the record of those years, it is fair to say that at least one cause of the decline in educational broadcasting was unfavorable actions by the Federal Radio Commission, and that such actions could have been prevented by continuous educational representation as developed on an emergency basis in the original FM hearings with such marked success.

3. Representation of Individual Stations. Almost every broadcast station in the U.S., except the educational stations, has legal representation in Washington to protect its particular interests. Without such representation, the station suffers. A recent example will illustrate.

Station WOI, Iowa State College of Agriculture, must go off the air at sundown, but before the war it was accustomed to receive special permission to stay on from time to time to broadcast major college events. During the war this permission was refused, allegedly as a national defense measure. It is at least possible that vigorous representation in Washington would have prevented the

national defense from being used in this way to protect the commercial interests of a Los Angeles station.

In 1946, Station WOI made two new applications for additional time. The first was granted by a commissioner. The commercial station involved, however, had strong representation in Washington. It protested, and the second identical application was denied by the same commissioner.

Through the years; such cases have occurred and the story has ended there. In this instance, however, Station WOI had direct Washington advice available, learned (what it had not known) that it had a legal right to appeal to the full Commission, appealed in good form, and got the additional hours to which it was entitled. This incident can be multiplied a dozen times a year, and with the growth of educational FM, it can be repeated a hundred times a year. Operating a radio station without Washington representation is almost like operating without an engineer or announcer.

4. Encouraging New Applications. The first step in establishing an American system of educational broadcasting was getting the channels. The second step is building the stations. In this second step, a strong organization of educational FM interests is essential.

As of March , 1946, only six noncommercial educational FM broadcast stations are on the air, an additional have been authorized by the F.C.C., and additional applications are pending. A reasonable goal is 500 educational stations on the air. An ideal situation would be, as a rough estimate, 1000 educational stations. Ideally, every receiver in the U.S. should be able to receive at least one educational FM broadcast station.

More than 200 educational institutions have already evidenced sufficient interest to write to the F.C.C. or U.S. Office of Education for further information. Throughout the country, there is an interest in the possibility of building educational FM stations. But there is no central organization to encourage the movement or to supply a continuous flow of information to prospective applicants for educational FM stations, or for assisting them in their planning.

The F.C.C., of course, is helpful in some connections. But it has only one employee occupied full-time with educational broadcasting. The U.S. Office of Education is helpful. But it has only two full-time employees. Neither, with present staff and budget, is able to meet more than a fraction of the need.

One function of a strong organization of educational FM broadcasters would be to assist the F.C.C. and U.S. Office of Education to get expanded budgets for educational FM work. It could encourage those agencies, and--if or where necessary--prod them. As a concrete example, the F.C.C. should have radio engineers continuously available on a full-time basis to assist educational applicants in planning the engineering aspects of their stations. Making such a service available violates the twenty-year tradition of the F.C.C. that each applicant must do its own engineering. But if an educational FM organization were to do as good a job on this issue as the special group did on getting 20 channels, it might be possible in a relatively short time to over come inertia and tradition and assist the F.C.C. in performing a genuine service for American education. Other examples are numerous.

In cases where the proposed educational FM organization was unable to secure action from the F.C.C. or the U.S. Office of Education, it could fill the gap itself. One example is with respect to

presentations to the state legislatures. In Connecticut in 1945, a plan for a statewide educational FM system was prepared for legislative action. Before the legislature met, however, the proponents of the system found that they urgently needed outside assistance--witnesses to testify on costs, to explain the plans of other states, to assure the Connecticut legislature that Federal licensing would not mean Federal domination, to tell how successful educational broadcasting had been elsewhere, etc. Telegraphic appeals were sent to both the F.C.C. and U.S. Office of Education, but neither, obviously, was in a position to enter such strictly state proceedings. The legislature, without the essential facts available, was unable to pass the bill and instead merely appropriated funds for further study. A two-year delay is the result. A strong organization of educational FM broadcasters, armed with facts, figures, precedents, and examples, may well tip the scales in similar instances in the future.

5. Exchange of Information. One of the most tragic lacks in the present educational FM broadcasting picture is the lack of even the most rudimentary machinery for collecting and exchanging information among educational FM broadcast stations and applicants for such stations. In New York, Columbia University establishes a Committee and (with the assistance of Professor Armstrong, who invented FM) solves most of the problems of establishing a sound educational FM service. Simultaneously at Harvard, a committee headed by Professor Ralph Barton Perry struggles with identical problems and has no access whatever to the thinking going on at Columbia. The Newark Board of Education has had its FM application approved by the F.C.C. and does not know what to do next; the Cleveland Board of Education has actually been broadcasting with FM since 1940 and knows most of

the answers, but there is no machinery whatever for making the Cleveland experience available to Newark.

Above all, there is urgent need for making known to newcomers the long experience of the pioneer educational standard broadcast stations--WHA at Wisconsin, WILL at Illinois, KUOM at Minnesota, WOI and WSUI in Iowa, and many others. These pioneers have learned the hard way. They have had notable success--a fact hidden by the inadequacies of most commercial listener polls and by the stations' failure to publicize themselves nationally. If the scores or hundreds of newcomers to educational broadcast station management are to flourish, they should have available without delay the accumulated experience of the successful pioneers. The interchange of experience between the pioneers and newcomers will in many instances make the difference between success and failure.

As a minimum, a strong organization of educational FM broadcasters should have a regular monthly publication devoted in part to new developments in educational FM and in part to mobilizing the experience of existing stations. On the basis of interest already evidenced, it may be expected that such a publication would have from the beginning a circulation of several thousand among persons deeply interested in educational FM broadcast station operation.

In addition, the organization would prepare and publish a series of monographs on successive aspects of station planning and operation, beginning with cost and engineering data and carrying on through to programming problems, policies, and possibilities.

6. Personnel Procurement. A broadcast station is much like an automobile; its ability to get where it wants to go without an accident depends more on the driver than on any other single factor.

Essentially, the success of any station will depend on its personnel, and in particular on its manager or director.

Experienced personnel is essential to even the smallest educational FM broadcast station. At least one engineer with broadcast experience and at least one program person with broadcast station experience is probably the minimum. Where and how is experienced personnel to be recruited?

A vigorous educational FM broadcast station organization should certainly operate a roster of personnel seeking to enter educational broadcasting, and-- where necessary-- should plug any gaps in the present facilities for personnel training, without, however, duplicating existing facilities. At the minimum, it should keep educational stations continuously informed of the existing training opportunities.

7. Establishment of Personnel Standards. Commercial broadcasting except at the top and on the business side, is a low-wage industry, and education is an even lower-wage industry. When these two fields merge, the possibilities of wages so low as to drive out competent personnel are very great. An example is one institution which proposes to spend $65,000 on a physical plant for educational broadcasting and to pay the director to whom that plant is entrusted at the rate of $2,500 a year.

A beginning can be made right now by insuring that all promotional literature on educational broadcasting addressed to prospective FM station applicants contains realistic appraisals of personnel costs and salary levels. In addition, special studies must be made of adequate salary and staffing levels; these studies can then be used locally by station managements in securing adequate budgets for their

own operations. In this and other ways, it may be possible for a strong educational FM broadcast station organization to avoid the starvation budgets which have destroyed so many stations in the past. The cost of educational FM operation is a drop in the bucket of educational appropriations; but half of a drop is not enough. Minimum budgets can be drafted below which institutions can be advised not to enter the field at all. In particular, sound advice can be prepared which will lessen the possibility of excessive investment in physical plant at the expense of subsequent operating budgets.

8. Program Experimentation. In broadcasting generally, it is reasonable to believe that the surface of program possibilities has barely been scratched. We Americans have not yet learned to harness the resources of American literature and the arts and sciences generally to broadcasting. Types of programs still undreamed may some day - perhaps soon - challenge even the Lone Ranger and Bob Hope. The special interests of listening minorities are still under-served. Opportunities are unlimited for experimentation; and shortly the stations will be on the air ready to make use of successful results.

The wire recorder turns the entire world into one vast studio. The transcription makes every program in the world potentially available to every station in the world. The causes of peace and tolerance make it essential that some simple lessons be learned, by radio or otherwise, before the human race becomes extinct. In this crucial situation, educational FM broadcast stations must contribute their share or they have no reason for being.

Much program experimentation can be carried on by individual stations from their own local resources. Other projects are too big for any single institution, and can best be undertaken by an organization

representing all educational broadcasters.

9. Listener Research, and "Impact Studies." If non-commercial educational FM broadcasting is to flourish, it must not only succeed but be able to prove that it has succeeded -- in terms both of achieving a significant audience and of serving that audience well. Listener research is of the essence, both to establish the fact that somebody is listening and to establish the impact of particular programs on particular audiences. An organization of educational broadcast stations should begin exploring this field at once.

10. Publicizing Educational FM Broadcasting. Perhaps the greatest failure of the pioneer educational standard broadcast stations now on the air is their failure to publicize their own magnificent achievements. On a recent NBC survey roughly 30 percent of all listeners in Madison, Wisconsin, reported that they listen more during the day to the University station than to any other station. In Iowa, Station WOI formerly ranked first in daytime listening in a score of counties, and now ranks second or third. Yet outside their immediate areas, the achievements of these stations in almost wholly unknown, so that others are not stimulated to do likewise and the whole enterprise loses momentum. A virile organization, among other projects, would remove the bushel which now hided the light of educational broadcasting.

11. Organization of Citizens Radio Councils. Important to the development of educational broadcasting that is truly responsive to the needs of the people is an organized system of local and state councils, culiminating perhaps in a national advisory council. Such citizens councils, made up of educators and lay representatives, are needed to support physical planning and to advise on program developments. Possibly membership could be on the basis of election by already

established citizens groups - PTA, farm organizations, labor, service clubs, etc. Information and leadership from a central organization is essential to expedite such a movement.

II. PLAN FOR AN ORGANIZATION OF NONCOMMERCIAL EDUCATIONAL FM BROADCAST STATIONS

This memorandum seeks to outline some considerations involved in establishing an organization powerful enough to tackle the tasks set forth in Memorandum I.

1. The proposed organization should be independent. It should not be an appendage of either the F.C.C. or the U.S. Office of Education. It must be free to help or to prod or to criticise those agencies, as the situation demands.

It should not be financed directly or indirectly by commercial broadcast interests. It should maintain the friendliest relationship with commercial interests as a basic principle, but it should deal with commercial broadcasting at arm's length, speaking out as specifically for educational interests as the National Association of Broadcasters speaks for commercial interests, without any inner conflict within the educational organization. Its independence will be especially important in the event that concerted efforts are made to break down the reservation of 20 FM channels for educational use. The mere existence of a strong educational FM organization, indeed, may be sufficient to prevent attack on this reservation.

It should be distinct and separate from organizations whose primary interest is educational programs on commercial stations. Such organizations perform an extremely important function. It is a different function, however, from representing and assisting educational institutions which are themselves the licensees of broadcast stations.

2. The proposed organization should be open to (a) educational institutions which now operate standard non-commercial broadcast stations,

(b) educational institutions which now operate noncommercial educational FM broadcast stations, and (c) educational institutions which have made application to the F.C.C. for educational stations. Associate membership should be open to (d) any institution which is considering or planning an educational station. Membership should stop right there, in order to maintain an organization which represents wholeheartedly and intensively the interests of educational stations as such. Individual memberships from persons actively engaged in radio work in the institutions specified above might, however, be considered.

3. Ultimately, the proposed organization should be self-supporting or nearly so. The services to be rendered are as essential a part of educational broadcasting as the electric power needed to operate the transmitter, and should be similarly covered in the budgets of each station. A considerable membership fee should ultimately be assessed -- after the organization has proved its worth. That fee should be shown in the sample budgets prepared for the guidance of prospective station applicants; and resolutions authorizing application for a license from the F.C.C. should simultaneously authorize membership in the association. During the initial period, however, before the organization has proved its worth to member stations, dues should be kept low enough to make possible universal membership.

In addition to membership dues, the association could procure revenue in various other ways. Its monthly publication could be self-supporting or very nearly so, and would almost certainly be able to secure substantial advertising revenue from equipment manufacturers. Some services, for example, the engineering of individual stations -- might be performed on a fee basis, and other special services might be rendered at cost.

4. Because of low initial dues and the comparatively small number of educational stations now on the air, outside assistance will be necessary initially. This assistance is of two types:

(a) Assistance with the routine organizational expenses -- salary of an executive secretary and assistant, rent, postage, travel expenses, printing, etc.

(b) Subventions to cover specific projects -- program experimentation, studies of personnel standards, listener research, etc.

5. A tentative budget for the items under (a) might include the following:

	Minimum estimate	Reasonable estimate
Salary of a full-time executive secretary, to be stationed in Washington but spend much of his time in the field ...	$6,000	$8,000
Salary of assistant who would function also as secretary-stenographer.....	1,800	2,600
Salary of field representative	---	4,000
Travel expenses	1,000	4,000
Cost of annual conference	1,000	2,000
Printing	1,000	5,000
Mimeographing and mailing.....	500	2,000
Miscellaneous office expenses	1,000	2,000
Rent.....	600	1,200
Totals.....	$12,900	$30,800

6. No tentative budget can be drawn for the items under (b). When it is recalled that the foundations appropriated more than $250,000 for the type of research undertaken by the old Federal Radio Education Committee, however, it is conceivable that a similar sum might ultimately become available.

7. The only organization now in existence which can initiate this work is the National Association of Educational Broadcasters. Essentially, the N.A.E.B. is the proposed organization, minus the full-time staff, the funds to do the job, and widespread representation of the new FM stations and prospective stations. The N.A.E.B. has already voted to open its membership to educational FM institutions, and has appointed a committee to study expansion generally. Expansion of the N.A.E.B. -- assuming that the standard broadcast stations which now comprise it are really prepared to expand and to shift the whole foundation of the organization to FM -- is the ideal means of realizing the goals outlined in Memorandum I.

8. Since the foundations are generally loathe to advance funds for mere organizational overhead, the most probable source of initial assistance should be the National Education Association. This Association is composed of all kinds of educational groups, and assists several of them in their work. If the National Association of Educational Broadcasters were to seek affiliation with and help from the N.E.A. a part of the problem might be solved.

Specifically, the N.A.E.B. would approach the N.E.A. with a concrete proposal for affiliation and for assistance over a two-year period. The assistance requested might cover the "minimum estimate" listed under (5) above -- namely, the salary of a full-time executive secretary and assistant, travel, printing, mimeographing, mailing, office space, miscellaneous office expenses, and the cost of two annual conferences -- one at the earliest possible date and one a year thereafter. Additional sums would come from dues and possibly from one or more of the foundations.

Since the N.E.A. constitution requires a full year before a new organization can become affiliated and hence eligible for assistance, some

interim device will be necessary. This might take the form of the N.E.A. establishing a Radio Section, and making the assistance available to the Radio Section. The executive secretary of the N.A.E.B. could then be appointed chief of the N.E.A. Radio Section, and other similar dovetailing arranged until such time as the N.A.E.B. itself became constitutionally eligible for assistance.

9. If this arrangement could be consummated, the next step for the expanded N.A.E.B. would be to secure Foundation assistance for particular projects -- including the launching of its journal, printing of monographs, program experimentation, etc.

10. If such a program is to be realized, the following action agenda might be undertaken by the N.A.E.B.:

(a) The drafting of a concrete proposal by the N.A.E.B. to the N.E.A. (perhaps based in whole or part on this memorandum as revised), in such form that it could be considered and approved by the N.E.A. board.

(b) The publicizing of the proposal, the securing of support from educational institutions and associations, and conferences with members of the N.E.A. governing body to ensure its approval.

(c) Simultaneously, a series of conferences between the N.A.E.B. and the foundations to explore the possibility of assistance from that quarter.

(d) The employment of the right man as executive secretary of the N.A.E.B., financed by the N.E.A. or the foundations, to carry on from there.

11. Time is of the essence. The first disappointed commercial FM applicants will be casting longing eyes on those educational channels any day now. Equipment for new FM stations will soon be

available. The proposed FCC rules and regulations governing educational FM broadcasting have already been circulated and may be adopted less than three months hence. Legislatures are planning their postwar educational budgets. Veterans discharged from the armed forces are finding other jobs. The first annual conference of the enlarged and expanded National Association of Educational Broadcasters should be held at once, so that the organization can really begin functioning at full capacity by early fall.

Scanned from the National Association of Educational Broadcasters Records
at the Wisconsin Historical Society as part of
"Unlocking the Airwaves: Revitalizing an Early Public and Educational Radio Collection."

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